



**Fw: ADEC letter re: Supersack dropped into the water from Port Heiden Project**

**Dave Bartus** to: Richard Mednick

01/27/2012 04:06 PM

The attached letter is an ADEC response to the super sack of PCB remediation waste from Port Heiden cleanup being conducted by the Air Force that "fell" through the dock in transit to Lower 48 disposal.

The letter that ADEC has prepared generally seems well written, but I wanted to make sure that if we have an interest or obligation regarding the recovery (including any associated sampling and analysis) that we are properly engaged. My recollection was that the Coast Guard has jurisdiction for pollution in waters of the US, but I'm not as clear whether that precludes any involvement with regard to TSCA/PCB or not. What I've seen so far in the response action is that all of the appropriate steps are being taken. One specific issue I'm curious about is the sampling and management of water draining from the super sack. Presumably, at the recovery stage where this will occur, the super sack is no longer in the water, and the decontamination standards of 761.79 for water would apply, not Coast Guard requirements. If so, then it probably would be prudent for EPA to draft a companion letter specifying where in the recovery process 761.61 requirements would apply, and the applicable sampling, decontamination, and disposal standards.

Thoughts/comments/recommendations?

Dave

----- Forwarded by Dave Bartus/R10/USEPA/US on 01/27/2012 03:58 PM -----

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Fyi.

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